

EXHIBIT F

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- RAMI KRANZ -

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK

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RAFAEL FOX, ET AL.,

Plaintiffs,

v. CIVIL CASE NO.

1:19-CV-04650-AJN-SN

STARBUCKS CORPORATION,

Defendant.

-----X

DATE: September 15, 2020

TIME: 10:00 A.M.

VIDEOCONFERENCE DEPOSITION OF RAMI

KRANZ, pursuant to Notice, before Hope Menaker, a

Shorthand Reporter and Notary Public of the State

of New York.

1 - RAMI KRANZ -

2 stores?

3 A. Absolutely. So in the food safety
4 manual, it states clearly that the store
5 manager or our partners are prohibited to use any
6 pesticides and that only the pest vendors can use
7 them.

8 Q. Are there any exceptions to that
9 policy?

10 A. I don't believe so, no.

11 Q. Is the food safety manual something
12 that's made available to all store employees?

13 A. Yes, it is.

14 Q. As to the best of your memory as you
15 sit here today have any pesticides, to your
16 knowledge, been applied in Starbucks stores by
17 Starbucks personnel apart from the one Hot Shot
18 incident that you referred to?

19 MR. MOY: Objection.

20 A. So through my duties and my days with
21 the district managers we had seen from time to
22 time different types of products, yes.

23 Q. What types of products, if you could
24 just name as many as you're aware of, that you are
25 aware have been used by employees in stores?

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2 consistent with Starbucks policy?

3 MR. MOY: Objection.

4 A. Was I fully aware? I was aware,
5 which is why I said I was wrong.

6 Q. Well, why did you choose to direct
7 employees to use CB-80?

8 A. Because I was trying to solve the
9 problem, but I did it in the wrong manner and I
10 learned my lesson from it.

11 Q. Subsequent to that event, did you
12 ever have any communications with any Starbucks
13 employees about the use of CB-80 in Starbucks
14 stores?

15 A. I have had communication with
16 Starbucks employees about the use of it and that
17 they shouldn't be using it.

18 Q. What is the danger -- withdrawn.

19 To your understanding, what is the
20 reason why CB-80 is not allowed in Starbucks
21 stores?

22 MR. MOY: Objection.

23 A. Because Starbucks employees are not
24 allowed to use any pesticides according to the
25 food safety manual.

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2 facilities when it comes to pest issues.

3 Q. Was it your understanding that AVP
4 was contracted to provide pest control services at
5 certain Starbucks stores in Manhattan?

6 A. Yes, it was.

7 Q. Do you know during what period of
8 years within your tenure they provided those
9 services?

10 A. I couldn't be -- I couldn't tell you
11 exactly what period. I don't manage in those
12 facilities.

13 Q. Who was the -- who do you believe is
14 the most likely person to have been responsible
15 for managing them in facilities, is there an
16 individual?

17 MR. MOY: Objection.

18 A. It would have been the facility
19 manager and the senior facility manager.

20 Q. In your role as quality assurance
21 director, did you ever provide instructions or
22 directions to AVP concerning how they do their
23 jobs?

24 MR. MOY: Objection.

25 A. So I've -- I spoke with Jill quite a

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2 if we -- you know, we see a snap trap that gets
3 caught in a broom, you know, when you're sweeping
4 underneath.

5 Q. When that happens, is there any
6 direction or guidance as far as what employees
7 should due to notify anyone or there's just no
8 policy there?

9 MR. MOY: Objection.

10 A. So officially, no, there isn't. What
11 I would coach is that just put it to the side and
12 leave a note for the pest vendors and let them
13 know, you know, where it is; and that's if we're
14 talking snap traps, just to be clear.

15 Q. With respect to Hot Shots if an
16 employee at a store discovers that a Hot Shot is
17 present, do you know if Starbucks has any rules or
18 guidelines as to what that employee should do?

19 A. There are no rules or guidelines
20 because we're not allowed to put the pesticide
21 there.

22 Q. So if an employee sees that it is
23 there --

24 A. Yes.

25 Q. -- to your understanding is there a

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2 process they're supposed to initiate?

3 A. I haven't seen a process officially
4 in any of the -- in any of the Starbucks
5 guidelines, no.

6 Q. Have you ever given instructions to
7 employees as to how they should respond if they
8 discover such a device in their store?

9 A. When asked by operations, my
10 advice has always been grab a rubbish bag, grab
11 the -- you know, the pesticide, put it in, you
12 know, holding the rubbish bag, tie a knot, and
13 dispose of it in the rubbish bin.

14 Q. Are there any legal or Health
15 Department standards that bear on how to
16 permissibly safely dispose of Hot Shots?

17 A. There are legal requirements, but not
18 Health Department requirements. It's the Label
19 law. So on the label of the product would tell
20 you how to dispose of them.

21 Q. And you just referred to or used a
22 phrase "label law" and what are you referring to,
23 what is that phrase?

24 A. On all pesticides, there's a label;
25 and any pest control technician, you know, when

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2 from my side of the story what I -- what I saw
3 when I first started with Starbucks. I can
4 explain that, but I can't tell you what Stephen
5 was writing.

6 Q. Of course I'm asking for what your
7 interpretation was in your own mind as you read
8 his words.

9 A. So facilities went through a change
10 around 2017, and what I mean by "a change" was
11 when I was started with Starbucks they -- they
12 didn't have the -- they didn't have the voice with
13 the operations team like QA did at the time. So I
14 know that -- I know that, you know, especially
15 when it came to Health Department issues, you
16 know, I had more voice with operations, but that's
17 my side; so what he meant by "more weight" I'm not
18 sure, but I know what I saw when I first started.

19 Q. Did you understand that Mr. Gallant
20 was asking you to do anything in particular?

21 A. What I understood was Mr. Gallant
22 just wanted me to emphasize, you know, the point
23 that he made with the operation leadership team.
24 That was my understanding of it.

25 Q. Did you do that?

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2 A. Absolutely. I -- I was on the
3 leadership team every -- every week, so every
4 Monday I met with the regional vice president and
5 the four HDs at the time. I'd -- the assistant
6 was also there and I brought this up and I
7 mentioned it; and then Ross also, you know,
8 emphasized the point where he did not want to see
9 anything and that's what started, you know,
10 everything. That's what started me, you know,
11 joining the regional directors huddle with their
12 district managers and emphasizing the point and
13 then the regional director emphasizing it again on
14 top of me.

15 I also joined, you know, some
16 district manager huddles, not all of them, where
17 we emphasized the point to the store managers; and
18 I also included into the shift safety workshops
19 that I did once a month and we emphasized it there
20 as well.

21 So, I mean, the minute it was brought
22 to our attention, I mean, we really -- you know,
23 we really took it as very serious and we started
24 speaking to everyone, and I can tell you the
25 leadership team was all onboard about getting the

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2 message out and not to use this at all.

3 Q. And within what period of time had
4 those actions resolved the problem of Hot Shots in
5 stores?

6 MR. MOY: Objection.

7 A. I can't tell you. It says Tuesday,
8 so it would have already started that following
9 Monday. So I would have spoken to them, but the
10 official meeting would have been on Monday and
11 that's -- it just started and then every week,
12 I -- I was bringing it up just to make sure that
13 it was emphasized.

14 Q. At some point in the course of doing
15 all of that emphasis, did you feel confident that
16 the message had gotten through and that the
17 problem was handled?

18 A. I felt confident that the message had
19 got through. That the problem was solved, I
20 can't -- I couldn't answer that because I don't go
21 into -- I'm confident that the message got
22 through. I can't be confident that the problem
23 was resolved because I wasn't in every store to
24 follow up. I was only in select stores
25 with the district managers and some direct --

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2 regional directors.

3 Q. Did you make any inquiries of anyone
4 in operations or elsewhere at the company to
5 ascertain whether --

6 MR. GRAFF: Let's go off the record.

7 (Whereupon, a brief discussion was
8 held off record.)

9 Q. Mr. Kranz, before the stretch break I
10 had been asking you whether you ever followed up
11 with operations management to determine whether
12 your efforts to spread the word about Hot Shots
13 had been successful. Did you make such inquiries?

14 A. Well, with the district managers I
15 spoke to them about it. I spoke to -- with the
16 regional directors during our one on ones.

17 Q. Did they advise you that Hot Shots
18 had been resolved as a going problem?

19 MR. MOY: Objection.

20 A. They advised me that -- that they'd
21 been speaking about it and it was a priority to
22 them and that they'd been speaking about it with
23 their team and advised their team to keep, you
24 know, pushing it down all the way down to the
25 barista level and advised everyone it was not

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2 Starbucks standards to use them.

3 Q. Was there ever any communication that
4 you were a part of about whether efforts that were
5 being made were sufficient to deter the misuse of
6 Hot Shots in stores?

7 MR. MOY: Objection.

8 A. I remember one e-mail from Ron
9 Schuler who was a regional director that confirmed
10 that the message was being handed out; and it was
11 also not an e-mail, but in the leadership team,
12 you know, I also got confirmation that they'd been
13 mentioning it with their team every time the
14 regional directors were out in stores.

15 Q. Do you have any information from any
16 source as to whether anyone at the company ever
17 conducted an investigation to determine the origin
18 of any particular Hot Shot in the Starbucks store?

19 MR. MOY: Objection.

20 A. Can you just repeat that one more
21 time, please; do I have any --

22 Q. I'll ask something different. As
23 far as you know, did Starbucks ever identify
24 specifically any individual who had placed a Hot
25 Shot in a store?

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2 A. I don't recall, but it's -- I really
3 don't recall. It's possible, but again I may have
4 been on an e-mail chain; but that's what I don't
5 recall.

6 Q. Turning back into the document, we
7 had been looking at the e-mail that Jill Shwiner
8 sent on August 1st, 2016 that's on the second page
9 of this exhibit.

10 A. Yes, 2016, here you go. Yes.

11 Q. Jill wrote -- in the first long
12 paragraph Ms. Shwiner wrote, "We occasionally find
13 them, Hot Shots, in some stores but recently there
14 has been an increase in the amount of stores we
15 find them in."

16 Mr. Kranz, did you ever reach out to
17 Ms. Shwiner to get any further information about
18 where she was finding Hot Shots?

19 A. I have spoken to Jill about that and
20 Jill e-mailed me and we've spoken about it, yes.

21 Q. Okay, and when you were forwarded
22 this e-mail where she said "recently there has
23 been an increase in the amount of stores we find
24 them in," did you discuss that specific statement
25 in her e-mail with her at or around the time you

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2 read it?

3 A. I don't recall if I had a
4 conversation specifically regarding that with Jill
5 around that time. I do recall, though, that I did
6 have a specific conversation about that with the
7 operation leadership team.

8 Q. The next paragraph begins, "We
9 generally find them on top of the cabinets or
10 below the FOH counters." In this context, do you
11 know what "FOH" refers to?

12 A. Front of house.

13 Q. On the occasion that you had been
14 relating when you were present and watched the
15 health inspector conduct an inspection in the
16 store, did the inspector get up on a ladder and
17 look above the tops of cabinets as part of the
18 inspection that you observed?

19 A. The health inspector had not gone on
20 top of ladders that I've ever seen.

21 Q. What about under the front of house
22 sink; was any part of the inspection that you
23 observed focused on that?

24 A. Absolutely.

25 Q. After this e-mail, when is the next

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2 your tenure where you had encouraged CB-80,
3 putting that aside --

4 MR. MOY: Objection.

5 MR. GRAFF: That wasn't a question.

6 Q. -- did you at any point yourself
7 observe CB-80 present in any Starbucks store?

8 A. No, I haven't.

9 Q. Is that something you also check for
10 on your store visits?

11 A. Part of our store visits and back
12 in -- prior to 2018 we were looking for
13 unauthorized -- like unauthorized chemicals, and
14 that's not just pesticides. That could also be
15 Ice Melt that wasn't purchased from Starbucks, it
16 could be Apple Cider Vinegar. Anything we haven't
17 purchased from Starbucks is considered an
18 unauthorized chemical.

19 Q. Are you familiar with a product
20 called D-Force?

21 A. Yes.

22 Q. What is it?

23 A. D-Force is very similar to CB-80 in
24 that it's an aerosol pesticide.

25 Q. Did EcoSure ever in its audits make

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2 president. So again my role was coaching,
3 consulting on anything to do with cleanliness,
4 food safety, Health Department which also included
5 pests.

6 So, again, I was emphasizing, you
7 know, the point, right, and keeping the
8 communication fresh in everyone's mind to ensure
9 that our team knows this is not a Starbucks
10 protocol, right, and that we should not be using
11 it at all. If they've got a problem, Starbucks
12 has the resources to fix the problem. So if it's
13 a pest control problem, we've got vendors. If
14 it's a facilities issue, we also have vendors and
15 handymen to come in and do that. If it's a
16 cleanliness issue, you know, they've got that; an
17 HVAC issue, we've got people for that. You know,
18 the store managers shouldn't be, you know, doing
19 this themselves.

20 Q. The last thing you just said, "the
21 store managers shouldn't be doing this
22 themselves," what do you mean?

23 A. Well, I mean the stores themselves,
24 the partners, right, shouldn't be taking this
25 under themselves as -- as per Starbucks' guidance

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2 sending it?

3 A. Yes, I brought it up to the
4 leadership team like I was doing every week.

5 Q. To the best of your knowledge and
6 information was there ever a systematic effort
7 made to search through stores, locate any Hot
8 Shots, and remove them in a systematic way all at
9 once?

10 MR. MOY: Objection.

11 A. Systematic way all at once, no, I
12 cannot answer that; but what I can say is that
13 through the communication from the leadership team
14 and through my in-field days with the district
15 managers and the regional directors, there was
16 very high awareness on the Hot Shots and while the
17 operations was in stores they were looking for
18 them.

19 Q. Again, is it the case that you have
20 no information as to whether operations ever
21 reached any conclusion as to the source of any
22 particular Hot Shots?

23 MR. MOY: Objection.

24 A. It's very difficult to answer because
25 for argument sake the Hot Shot that I found two,

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2 Q. Are there specific individuals who
3 were the regional directors in 2017 for Starbucks?

4 A. Yes. So if we look at Exhibit Kranz
5 15, if you look at the e-mail that I sent out to
6 it says it lists the regional directors and the
7 regional vice presidents.

8 Q. That's very helpful, thank you.

9 Would those be the individuals who
10 you would have had in mind to send this next
11 e-mail to?

12 A. Yes.

13 Q. Do you know what, if anything, was
14 actually done in response to your e-mail?

15 A. Can you clarify that; what was done
16 by who?

17 Q. By the regional managers in response
18 to your e-mail which was prompted by Jill's report
19 here. Do you know what happened after you sent
20 your e-mail?

21 A. Yes. So, again, I would have
22 mentioned it in the leadership team meeting on
23 Monday, which would have been the following
24 Monday. They would have mentioned it in their
25 huddles with their district managers and then

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2 was going to reiterate the message again with his
3 district managers, right, and that -- you know,
4 reiterate the message that it's not going to
5 be -- that it's not a Starbucks standard, right,
6 and that we should not be using it at all.

7 Q. Are there other Starbucks standards
8 that are violated without disciplinary
9 consequences, that you're aware of?

10 MR. MOY: Objection.

11 A. No, I don't know anything about
12 disciplinary actions because, again, it's not part
13 of my role and responsibility and I'm not privy to
14 that information.

15 Q. When we have been talking about the
16 policy and how you've reiterated it that Hot Shots
17 aren't to be used, to be completely clear your
18 understanding was that it was a mandatory policy,
19 not like an advisory guideline; is that fair?

20 A. Yes, it's a Starbucks standard
21 written in the food safety manual.

22 Q. I've just posted a document, Kranz
23 Exhibit 44. It's a one-page document Bates
24 numbered DEF 27788.

25 (Whereupon, Kranz Exhibit 44 was

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2 MR. MOY: Objection.

3 A. Without checking the inspection
4 report, I don't recall.

5 Q. Could I ask you to read the last full
6 sentence.

7 A. "Please, I ask again for our
8 partners' safety, health, and brand (protecting A
9 grade) pass on this message onto the DM, SM and
10 have them all removed."

11 Q. To the best of your knowledge, did
12 the message get passed on and lead to all of the
13 Hot Shots being removed?

14 A. To the best of my knowledge, the
15 communication was -- you know -- cascaded down. I
16 know that they were looking for Hot Shots; and the
17 district managers and regional directors when they
18 were in stores, I know they were taking it very
19 seriously.

20 Were all of them removed, I can't
21 tell you if all of them were removed because I
22 don't know if they found everything; but I know
23 they were actively looking for it and taking it
24 very seriously.

25 Q. You had mentioned before that you did

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2 or dictionary meaning that it holds for you --

3 MR. MOY: Objection.

4 Q. -- personally?

5 MR. MOY: Objection.

6 A. Again, it was just a phrase that I
7 was using. It was not meant to -- meant to mean
8 anything else, you know, no other meaning. It was
9 just letting Jill know that I was going to be
10 talking to the leadership team and that we're
11 taking it very seriously.

12 Q. What, if anything, did you do in
13 connection with this after you sent the e-mail?

14 MR. MOY: Objection.

15 A. So again at the leadership team
16 meetings on Monday, you know, I mentioned it to
17 them. Ross again reiterated the importance of it.
18 The regional directors, you know, again agreed
19 and, you know, understood the importance of it;
20 and also agreed to continue talking to their team
21 and cas -- cascade it all the way down the barista
22 level.

23 Q. What, if anything, to your
24 understanding was done that had not already been
25 done before by you or the leadership team in

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2 connection with this e-mail?

3 MR. MOY: Objection.

4 Q. I can ask the question differently.
5 Back to the last sentence that you wrote that
6 we've been looking at, at the beginning it says "I
7 can have another talk with the team and stress the
8 importance of breaking this habit." Had you
9 previously had a talk with the team where you
10 stressed the importance of not using Hot Shots?

11 A. I had previously talked to the team
12 about stressing the importance, right, of not
13 using any pesticides, yes.

14 Q. How many times prior to this had you
15 had such discussions with the team?

16 A. I couldn't recall an exact number,
17 but it had been multiple times.

18 Q. Would you be able to say if it was
19 more or less than ten?

20 A. I'll be guessing --

21 MR. MOY: Objection.

22 Rami, give me an opportunity to
23 object.

24 THE WITNESS: Sorry.

25 MR. MOY: All right, go on.

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2 A. Nothing different, just reiterating
3 the importance of it and reiterating the
4 importance of cascading it down to that their team
5 and getting the communications down to everyone
6 and ensuring that everyone understood.

7 Q. So on the multiple prior occasions
8 when you had the discussion, was it your
9 understanding that the information was pushed down
10 cascading to the teams and understood?

11 A. Not only was it understood by me, but
12 I'd also personally seen it too.

13 Q. Other than what's written here, did
14 you have any further followup with Ms. Shwiner
15 about this issue?

16 MR. MOY: Objection.

17 A. Again, it's a possibility because I
18 spoke with Ms. Shwiner numerous times over the
19 phone. Not just always through e-mail, sometimes
20 even texts as well. So I can't tell you what
21 followup I had with this, but I'm sure there was
22 some.

23 Q. Is there anything else beyond what
24 you did that you believe you could have done to
25 address the ongoing recurrence of Hot Shots in the

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2 stores?

3 MR. MOY: Objection.

4 A. So in my role and responsibility I
5 believe that I was doing everything that I could,
6 okay, in my power at Starbucks to communicate, to
7 coach, to consult the operations team.

8 Q. Do you believe that the operations
9 team should have done anything different or
10 additional beyond what it did to address the
11 problem?

12 MR. MOY: Objection.

13 A. Again, I can't talk about the
14 operations team because I wasn't privy to
15 everything that they did.

16 Q. When you had another discussion with
17 the operations team about the subject, did you ask
18 them to look into how it was that Hot Shots were
19 becoming present in their stores, if any were
20 present?

21 A. So during our conversations we
22 reiterated that AVP and specifically Jill, right,
23 had contacted me, right, and we reiterated the
24 importance of our partners following our
25 standards.

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2 team meeting. So it's the weekly meeting that the
3 leadership team gathers around.

4 Q. And I think we've touched on it, but
5 could you by position identify the participants in
6 a normal weekly leadership meeting?

7 A. Yes. Back when Ross was in charge
8 and the regional vice president it was the
9 regional directors, it was QA, and sometimes
10 facilities. When Tracy came onboard, she also put
11 in a lot of the other cross-functional teams so
12 there was design, there was construction, there
13 was real estate, facilities was there, QA was
14 there, the PNAP was there; so -- yep.

15 Q. And the format for these meetings
16 would typically be a conference call or something
17 else?

18 A. No, it was a in-person meeting, but
19 it could also be -- you could also dial in.

20 Q. In connection with this specific
21 meeting, were you in person or on the phone?

22 A. I was on the phone with this.

23 Q. Did you have a pre-drafted list of
24 points or talking points or notes about what you
25 were going to say on the call on this subject?

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2 A. I believe I did, yes.

3 Q. If -- when you refer -- sorry. On
4 the e-mail on the first page on the second half
5 from you to Tracy Gaven-Bridgeman on January 23rd,
6 2018, when you write "I did elaborate during the
7 call" and then you put these bullet points, is it
8 your testimony these bullet points are a summary
9 of what you communicated orally during the call?

10 A. My testimony will be that this is a
11 summary of the highlights of some of the things
12 that I mentioned during the call, not everything.

13 Q. How -- in terms of the organization
14 or that agenda for the meetings do you have a
15 regular speaking slot, is there a particular role
16 that you play in addressing the group?

17 A. So this is a new -- so this is a
18 leadership team meeting, so they do a business
19 update and then everyone -- they do a round-robin,
20 so everyone gets a chance to talk.

21 Q. And would this have been -- would
22 this have been something that you communicated to
23 the group during your slot to speak in the
24 rotation?

25 A. Yes, it would have.

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2 regarding the use of pesticides; and obviously at
3 that time I had not been hearing of the, you know,
4 Hot Shots or other pesticides being used, so my
5 opinion was that it was improving.

6 Q. During what period of time did you
7 believe that it was improving versus being
8 constant or getting worse, like what is the date
9 range of time that you're referring to, if you're
10 able to express it that way in the sentence?

11 MR. MOY: Objection.

12 A. So the date would be the first time
13 Jill brought it to our attention to that
14 particular time.

15 Q. Do you remember what month or year
16 Jill first brought it to your attention?

17 A. I remember it being 2016.

18 Q. So from 2016 until January 23rd,
19 2018, do you believe that the situation with Hot
20 Shot use was improving in stores?

21 A. From my notes here, yes.

22 Q. And that's based on reports or
23 information communicated to you about the
24 existence of Hot Shots in stores?

25 A. What reports are you referring to?

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2 not what Kim was writing up; but sharing is the
3 sharing her thoughts on the business from
4 Rockefeller Center.

5 Q. Thank you. Thank you. I wasn't sure
6 if sharing meant something beyond that.

7 A. No.

8 Q. In the parenthetical at the end of
9 the sentence that she writes she says, "(Jasmine
10 similar to" I guess the store number and address.
11 Do you have any information about what she's
12 referring to there, is the reference familiar?

13 A. This reference isn't jogging my
14 memory, but again, you know, it's -- it's over two
15 years ago now.

16 Q. Apart from what's in this e-mail, did
17 you ever give any direction to Ms. Healy or
18 anybody in facilities about how to handle Hot
19 Shots if they discovered them?

20 MR. MOY: Objection.

21 A. So again, you know, I've been asked,
22 you know, by some of the -- again, I can't, you
23 know, remember who exactly, you know, a safe way
24 of disposing of them. So my personal opinion was
25 to -- like I mentioned prior, was to grab a

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2 rubbish bag, invert it, grab the Hot Shot, pull it
3 through, tie a knot and dispose of it in the
4 rubbish bin.

5 Q. It appears that Ms. Healy sent a
6 followup e-mail on April 13th at 7:40 p.m. and
7 that you then responded to her followup e-mail; is
8 that how you're reading the chain?

9 MR. MOY: Objection.

10 Q. Another way to ask it: Your e-mail
11 at the top of the page to, what e-mail below were
12 you responding?

13 A. So, yup, I was responding back to
14 Kim, Kim Healy.

15 Q. What did you write?

16 A. I wrote "Thank you, Kim. I'll
17 discuss with leadership team."

18 Q. Did you discuss it with the
19 leadership team?

20 A. Yes. If I said to Kim I'll discuss
21 it then, yes, I would have.

22 Q. Do you know whether the leadership
23 team or any members of the leadership team decided
24 to take any action based on the information?

25 MR. MOY: Objection.

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2 Mr. Kranz, is it your understanding
3 that you've been designated by the defendant to
4 testify about that subject?

5 A. Yes.

6 Q. Did you do any preparation work in
7 particular to obtain more information about this
8 specific subject?

9 MR. MOY: Objection.

10 A. No, I didn't.

11 Q. The line here refers to your
12 "communications with representatives of AVP"?

13 A. Uh-huh.

14 Q. We touched on Jill Shwiner and Paul
15 D'Auria. Have you had any communications with
16 anyone else at AVP, as far as you know?

17 A. Not that I know of. Jill was my main
18 contact at AVP.

19 Q. And the sentence where it ends it
20 says, "as well as the initiatives and actions
21 undertaken to remediate the same." What
22 initiatives were undertaken to remediate the use
23 of DDVP or Hot Shots in Starbucks stores?

24 A. So my initiatives and actions
25 undertaken -- because I can discuss what I did, I

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2 can't discuss what the operations team did; but I
3 brought it to the operations team's attention via
4 e-mails and in-person meetings at the New York
5 Metro leadership team meetings. I made them aware
6 via the huddles that I joined and mentioned in the
7 huddles, and then had the regional director or the
8 leader of that team reiterate the message and to
9 make -- to emphasize that message; and I also
10 added it to our shift supervisor workshop so that
11 we could get a broader range and get it, you know,
12 to more people as well and more partners within
13 the New York Metro area.

14 Q. When it refers here to the actions
15 undertaken to remediate DDVP or Hot Shot use in
16 Starbucks stores, is that any different than the
17 initiatives that you were just describing?

18 A. No, it's one and the same.

19 Q. You have no information about what
20 operations did with the information that you
21 provided to them, beyond hearing it from you?

22 A. I only have knowledge of what
23 operations did when I observed it during the
24 huddles and when I observed it in the field.
25 Outside of that I have no -- you know, I had no